

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

PARKER PELHAM, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

VBIT TECHNOLOGIES CORP., VBIT MINING
LLC, ADVANCED MINING GROUP, DANH
CONG VO A/K/A DON VO, PHUONG D VO A/K/A
KATIE VO, SEAN TU, JIN GAO, LILLIAN ZHAO,
AND JOHN DOE INDIVIDUALS 1-10, AND DOE
COMPANIES 1-10,

Defendants.

C.A. No.: 23-cv-162-CFC-SRF

CLASS ACTION

**DECLARATION OF BRIAN E. FARNAN IN SUPPORT OF MOTION OF ALISHA
MCKELLAR TO APPOINT LEAD PLAINTIFF AND APPROVE LEAD PLAINTIFF'S
SELECTION OF COUNSEL**

I, Brian E. Farnan hereby declare under penalty of perjury:

1. I am an attorney of Farnan LLP, proposed Liaison Counsel in this action, and have personal knowledge of the facts set forth herein. I am duly admitted to practice law in the State of Delaware and before this Court. I make this Declaration in support of the Motion of Alisha McKellar a/k/a Alisha Lee ("Movant") to be appointed as Lead Plaintiff and to approve of The Rosen Law Firm, P.A. to serve as Lead Counsel and Farnan LLP to serve as Liaison Counsel.

2. Attached hereto as Exhibit 1 is a true and correct copy of the PSLRA early notice.

3. Attached hereto as Exhibit 2 is a true and correct copy of Movant's PSLRA certification.

4. Attached hereto as Exhibit 3 is a true and correct copy of Movant's loss chart.

5. Attached hereto as Exhibit 4 is a true and correct copy of The Rosen Law Firm, P.A.'s firm resume.

6. Attached hereto as Exhibit 5 is a true and correct copy of Farnan LLP's firm resume.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: April 17, 2023

/s/ Brian E. Farnan
Brian E. Farnan